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Writer's Direct Access  
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July 10, 2013

**Via FOIAonline**

FOIA Coordinator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

**Re: FOIA Request for TSCA Information, CASRN 8002-74-2**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA) (5 U.S.C. § 552), and EPA's freedom of information regulations, I am writing to request information regarding the chemical substance, *Paraffin waxes and Hydrocarbon waxes* (CASRN 8002-74-2). Specifically, we are aware that the current TSCA Inventory Chemical Substance Definition (CSD) for this substance is different from the CSD for this substance when it was first listed on the TSCA Inventory.<sup>1</sup> We hereby request any non-confidential correspondence, Agency memoranda, and other documents related to this change in the CSD for CASRN 8002-74-2. We believe this change occurred around 2003.

We also request additional information for this substance, as follows:

- 1) The Toxic Substances Control Act (TSCA) (15 U.S.C. § 2601 et seq.) Inventory Reporting forms (either "Form C's," PMN's, or any such forms) that were used to report this substance for the TSCA Chemical Substance Inventory ("TSCA Inventory");

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<sup>1</sup> The CSD for CASRN 8002-74-2 currently reads: "A complex combination of hydrocarbons obtained from petroleum fractions (by solvent crystallization or the sweating process) or from the catalytic hydrogenation of carbon monoxide (the Fischer-Tropsch Process). It consists predominantly of straight chain hydrocarbons having carbon numbers predominantly greater than C<sub>20</sub>."

Previously, the CSD was as follows: "A complex combination of hydrocarbons obtained from petroleum fractions by solvent crystallization (solvent deoiling) or by the sweating process. It consists predominantly of strain chain hydrocarbons having carbon numbers predominantly greater than C<sub>20</sub>."

KELLER AND HECKMAN LLP

FOIA Coordinator

July 10, 2013

Page 2

2) A Chemicals in Commerce Information System (CICIS) (or equivalent) printout for this substance; and

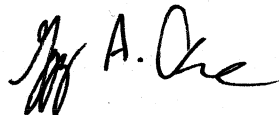
3) The number of companies, if any, who reported this substance for the TSCA Inventory but who claimed their identity as confidential.

With respect to item (1), please note that we are requesting copies of the original TSCA Inventory form(s) reporting this substance, not, for example, a computer printout indicating receipt of reporting form(s). We are also not requesting any TSCA Inventory Update Rule or TSCA Chemical Data Reporting Rule forms submitted for this substance.

We agree to pay reasonable search and reproduction costs for this information, up to \$25. A quick response would be greatly appreciated.

If you have any questions concerning this request, please do not hesitate to contact me at (202) 434-4302 or [clarkg@khlaw.com](mailto:clarkg@khlaw.com); or my colleague, Tom Berger, at (202) 434-4285 or [berger@khlaw.com](mailto:berger@khlaw.com). Thank you in advance for your assistance.

Best regards,

A handwritten signature in black ink, appearing to read "G. A. Clark", with a stylized flourish at the end.

Gregory A. Clark